

JOSHUA M. MASUR (SBN 203510)  
*joshua.masur@hglaw.com*

**HALEY GUILIANO LLP**  
 111 North Market Street, Suite 900  
 San Jose, California 95113  
 Telephone: +1 669 213 1056  
 Facsimile: +1 669 500 7375

BRIAN J. BECK (*pro hac vice*)  
*brian.beck@hglaw.com*

**HALEY GUILIANO LLP**  
 75 Broad Street, Suite 510  
 New York, New York 10004  
 Telephone: +1 669 213 1058  
 Facsimile: +1 669 500 7375

*Attorneys for Plaintiffs*

KELLY M. KLAUS (SBN 161091)  
*kelly.klaus@mto.com*

BLANCA F. YOUNG (SBN 217533)  
*blanca.young@mto.com*

JOHN L. SCHWAB (SBN 301386)  
*john.schwab@mto.com*

**MUNGER, TOLLES & OLSON LLP**  
 560 Mission Street, 27<sup>th</sup> Floor  
 San Francisco, California 94105-2907  
 Telephone: (415) 512-4000  
 Facsimile: (415) 512-4077

SONAL N. MEHTA (SBN 222086)  
*Sonal.Mehta@wilmerhale.com*

**WILMER CUTLER PICKERING  
 HALE AND DORR LLP**

2600 El Camino Real, Suite 400  
 Palo Alto, California 94306  
 Telephone: (650) 858-6000  
 Facsimile: (650) 858-6100

JOSEPH TAYLOR GOOCH (SBN 294282)  
*Taylor.Gooch@wilmerhale.com*

**WILMER CUTLER PICKERING  
 HALE AND DORR LLP**

50 California St., Suite 3600  
 San Francisco, California 94111  
 Telephone: (628) 235-1000  
 Facsimile: (628) 235-1001

*Attorneys for Defendants*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

REARDEN LLC, *et al.*,

Plaintiffs,

v.

TWDC ENTERPRISES 18 CORP. f/k/a THE  
 WALT DISNEY COMPANY, a Delaware  
 corporation, *et al.*,

Defendants.

Case No. 4:22-cv-02464-JST

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING OPPOSITION  
 AND REPLY BRIEFING DATES ON  
 DEFENDANTS' MOTION TO DISMISS  
 IN PART PLAINTIFFS' FIFTH  
 AMENDED COMPLAINT [DKT. 94]**

Hearing Date: May 22, 2025  
 Time: 2:00 p.m.  
 Crtrm.: 6 (2<sup>nd</sup> Floor)

**STIPULATION**

Plaintiffs Rearden LLC and Rearden Mova LLC (collectively, “Plaintiffs”) and Defendants TWDC Enterprises 18 Corp., Disney Studio Production Services Co., LLC, Walt Disney Pictures, Marvel Studios LLC, MVL Film Finance LLC, and Lucasfilm Ltd. LLC (collectively, “Defendants”) (Plaintiffs and Defendants jointly the “Parties”), by and through their respective counsel of record, stipulate as follows:

1. Plaintiffs filed their complaint on April 21, 2022 (Dkt. 1), and a corrected/first amended complaint on June 9, 2022 (Dkt. 15);

2. Pursuant to the Court’s Order (Dkt. 32) on the Parties’ joint administrative motion (Dkt. 24), Defendants filed a motion to dismiss the corrected/first amended complaint on August 9, 2022 (Dkt. 34);

3. Pursuant to the Court’s Order (Dkt. 39) on the Parties’ joint administrative motion and stipulation (Dkt. 37), Plaintiffs filed a second amended complaint on September 26, 2022 (Dkt. 38), and Defendants filed a motion to dismiss the second amended complaint on October 24, 2022 (Dkt. 42);

4. On February 21, 2023, the Court granted Defendants’ motion to dismiss with leave to file a third amended complaint by March 14, 2023 (Dkt. 54);

5. On May 24, 2023, Plaintiffs filed their third amended complaint (Dkt. 64); and Defendants moved to dismiss on July 7, 2023 (Dkt. 68);

6. On March 21, 2024, the Court granted Defendants’ motion to dismiss Plaintiffs’ copyright infringement claims with leave to amend and denied the motion to dismiss the patent infringement claims (Dkt. 76);

7. On April 11, 2024, Plaintiffs filed their Fourth Amended Complaint (Dkt. 77);

8. On April 18, 2024, the Parties stipulated to extend Defendants’ deadline for filing a motion to dismiss the Fourth Amended Complaint to May 16, 2024 (Dkt. 78);

9. On May 16, 2024, Defendants filed their motion to dismiss the fourth amended complaint, and noticed the motion for hearing on August 1, 2024 (Dkt. 80);

1           10.     On December 20, 2024, the Court granted Defendants' motion to dismiss Plaintiffs'  
 2 secondary infringement allegations in their copyright infringement claims with leave to amend and  
 3 denied the motion to dismiss the direct infringement allegations in their copyright infringement  
 4 claims (Dkt. 87);

5           11.     On January 24, 2025, Plaintiffs filed their Fifth Amended Complaint (Dkt. 90);

6           12.     On March 3, 2025, Defendants filed their motion to dismiss in part the fifth  
 7 amended complaint, and noticed the motion for hearing on May 22, 2025 (Dkt. 94);

8           13.     Plaintiffs have requested, and Defendants have agreed, to extend the time for  
 9 Plaintiffs to file an opposition to Defendants' motion to dismiss in part the Fifth Amended  
 10 Complaint, provided that Defendants have the additional time to file their reply set forth below.  
 11 Accordingly, the Parties have agreed to the proposed request on these matters set forth in the next  
 12 paragraph.

13           THEREFORE, the Parties respectfully request that the Court issue an Order granting this  
 14 stipulation, and providing that the deadline for Plaintiffs to file their opposition to Defendants'  
 15 motion to dismiss in part the Fifth Amended Complaint be extended from March 17, 2025 to  
 16 April 8, 2025 and the deadline for Defendants to file their reply in support of their motion to  
 17 dismiss in part the Fifth Amended Complaint be extended to May 8, 2025 (the reply otherwise  
 18 would be due March 24 if the opposition were to be filed on March 17); and that the hearing date  
 19 remain May 22, 2025, or as soon thereafter as it may be heard.

20  
 21 **IT IS SO STIPULATED.**

22  
 23 Dated: March 13, 2025

**HALEY GUILIANO LLP**

JOSHUA M. MASUR

BRIAN J. BECK

24  
 25 By: /s/ Brian J. Beck

Brian J. Beck

26 Attorneys for Plaintiffs  
 27  
 28

1 Dated: March 13, 2025

MUNGER, TOLLES & OLSON LLP

2  
3 By: /s/ John L. Schwab

4 John L. Schwab

Attorneys for Defendants

5  
6 **CIVIL LOCAL RULE 5-1 ATTESTATION**

7 I, Brian J. Beck, am the ECF user whose credentials were utilized in the electronic filing of  
8 this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that John L. Schwab  
9 concurred in the filing of this document.

10 /s/ Brian J. Beck

11 Brian J. Beck

12  
13 **[PROPOSED] ORDER**

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15 Plaintiffs' opposition to Defendants' motion to dismiss in part the Fifth Amended  
16 Complaint shall be filed on or before April 8, 2025.

17 Defendants' reply in support of their motion to dismiss in part the Fifth Amended  
18 Complaint shall be filed on or before May 8, 2025.

19 The hearing on Defendants' motion to dismiss shall remain May 22, 2025.

20  
21 DATED: \_\_\_\_\_, 2025

22  
23 HON. JON S. TIGAR

24 United States District Judge